

FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT
UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Anthony David Matros

(Enter above the full name of the plaintiff in this action)

COMPLAINT

V.

Kevin T. McCannell

Civil Action No.

(To be supplied by the Clerk of the Court)

RECEIVED

JUN 04 2025

AT 8:30 _____ M
CLERK, U.S. DISTRICT COURT - DNJ

(Enter the full name of the defendant or defendants in this action)

INSTRUCTIONS; READ CAREFULLY

1. This complaint must be legibly handwritten or typewritten, signed by the plaintiff and subscribed to under penalty of perjury as being true and correct. All questions must be answered concisely in the proper space on the form. Where more space is needed to answer any question, attach a separate sheet.
2. In accordance with Rule 8 of the Federal Rules of Civil Procedure, the complaint should contain (1) a short and plain statement of the grounds upon which the court's jurisdiction depends, (2) a short plain statement of the claim showing that you are entitled to relief, and (3) a demand for judgment for the relief which you seek.
3. You must provide the full name of each defendant or defendants and where they can be found.
4. You must send the original and one copy of the complaint to the Clerk of the District Court. You must also send one additional copy of the complaint for each defendant to the Clerk. Do not send the complaint directly to the defendants.
5. Upon receipt of a fee of \$402.00 (a filing fee of \$350.00, and an administrative fee of \$52.00), your complaint will be filed. You will be responsible for service of a separate summons and copy of the complaint on each defendant. See Rule 4, Federal Rule of Civil Procedure.

6. If you cannot prepay the \$402.00 fee, you may request permission to proceed in forma pauperis in accordance with the procedures set forth in the application to proceed in forma pauperis. See 28 U.S.C. §1915. (If there is more than one plaintiff, each plaintiff must separately request permission to proceed in forma pauperis.)

7. If you are given permission to proceed in forma pauperis, the \$52.00 Administrative Fee will not be assessed. The Clerk will prepare and issue a copy of the summons for each defendant. The copies of summonses and the copies of the complaint which you have submitted will be forwarded by the Clerk to the United States Marshal, who is responsible for service. The Marshal has USM-285 forms you must complete so that the Marshal can locate and serve each defendant. If the forms are sent to you, you must complete them in full and return the forms to the Marshal.

QUESTIONS TO BE ANSWERED

1a. Jurisdiction is asserted pursuant to (CHECK ONE)

☒ 42 U.S.C. §1983 (applies to state prisoners)

☐ Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics, 403 U.S. 388 (1971) and 28 U.S.C. § 1331 (applies to federal prisoners)

If you want to assert jurisdiction under different or additional statutes, list these below:

1b. Indicate whether you are a prisoner or other confined person as follows:

☐ Pretrial detainee

☐ Civilly-committed detainee

☐ Immigration detainee

☒ Convicted and sentenced state prisoner

☐ Convicted and sentenced federal prisoner

☐ Other: (please explain) _____

2. Previously Dismissed Federal Civil Actions or Appeals

If you are proceeding in forma pauperis, list each civil action or appeal you have brought in a federal court while you were incarcerated or detained in any facility, that was dismissed as frivolous or malicious, or for failure to state a claim upon which relief may be granted. Please note that a prisoner who has on three or more prior occasions, while detained in any facility, brought an action or appeal in a federal court that was dismissed as frivolous or malicious, or for failure to state a claim upon which relief may be granted, will be denied in forma pauperis status unless that prisoner is under imminent danger of serious physical injury. See 28 U.S.C. § 1915(g).

a. Parties to previous lawsuit:

Plaintiff(s): _____

Defendant(s): _____

b. Court and docket number: _____

c. Grounds for dismissal: () frivolous () malicious
() failure to state a claim upon which relief may be granted

d. Approximate date of filing lawsuit: _____

e. Approximate date of disposition: _____

If there is more than one civil action or appeal, describe the additional civil actions or appeals using this same format on separate sheets.

3. Place of Present Confinement? Northern State Prison

4. Parties

(In item (a) below, place your name in the first blank and place your present address in the second blank. Do the same for additional Plaintiffs, if any.)

a. Name of plaintiff: Anthony David Myles

Address: Northern State Prison 168 Frontage Road, P.O. Box 2300, Newark, NJ. 07114

Inmate #: SBI #: 865432E / State #: 1330996

b. First defendant:

Name: Kevin T. McConnell

Official position: Manager K&T Fence Inc./Williamstown NJ 08094

Place of employment: K&T Fence Inc. Williamstown NJ 08094

How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

This person retaliated against a whistle blower.
I have been whistle blowing on K&T Fence Inc. Since
July 2022. He went to a judge or two to get out of the
Whistle Blowing audit judge Nancy Ridgeway.

c. Second defendant:

Name: _____

Official position: _____

Place of employment: _____

How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

d. If there are more than two defendants, attach a separate sheet. For each defendant specify: (1) name, (2) official position, (3) place of employment, and (4) involvement of the defendant.

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Anthony David Mitros 865432E / 1330996 Northern State Prison E / 1 / West

Dear Court Clerk,

The McConnells are the type of people that do not want to take ownership for what they have done. For instance they have been negligent and really take advantage of people and are really good at being master manipulators. That's well and good and all but take ownership of the things you do. They make it like there negligence is my fault. Like they can do no wrong I hate or dislike I should say people that when they are wrong not a little wrong or just a tad bit wrong a lot wrong so wrong they need a lawyer for instance. They are that wrong and blame me for there problems. It's like there saying they committed fraud and retaliated against a whistle blower for years because of me Anthony Mitros there neighbor was gay and is a loser. That is not why they committed fraud and violated the law.

They will admit I am trying to get money for my problems. You see in there mind they still have done no wrong. They think I pump my family for information. They do two things all the time not admit that they are wrong and not admitting it am smart. They think that there problems are invisible how could I see all that myself. people are smarter than they think. I do not ask my family for information about them. They do all of everything they do it in plain eye site. I do not need his kid following me around and harrassing me all day. Rather than fix some or any of there problems they would rather harrass me all day take off of work walk around naked and get people to try to screw them consensually xxx.

All his kid daughter does. Not go to work for Inspira Medical Center she takes off as much as she can and harrasses me. Sometimes she would show up at my parents house while I was drunk or asleep and throw a secret sex party my parents leave her harrass me with kids I went to school with Buena Regional High School to embarrass me they don't want me being better or cooler than anyone. It is really annoying mean while. While there violating the law. Everything I pointed out: Registering work vehicles in business owners name, insuring work vehicles in business owners name, having decal's or business logo on

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Anthony David Mitros 865432E/1330996 Northern State Prison E/1 /west work vehicles, hiring of illegal immigrants, hiring of employees under the table, hiring of employees under the table on social security disability and they are not reporting it to social security, driving work vehicles with out license John Purchesy and Illegal Alfredo do not have license the illegal has his car registered in Pennsylvania somehow, not reporting tax properly, not reporting employee wages properly.

The list goes on and on. This guy fails to report any employee wages and taxes at all. This guy for at least (14) fourteen years has failed to report any employee taxes at all or any employee wages. I have worked for this man twice in the past three years. I have lived across the street from his business for about (19) nineteen years. He does not have any IRS tax forms for employees to sign at all. He has never had them for as long as I know. The person has illegal immigrants working for him as we speak with out green cards or work visa. Completely illegal the persons name is Alfredo he worked for him over (14) years fourteen years. He also hired John Purchesy he works for K&J Fence Inc. He has worked for K&J Fence Inc. for about (10) ten years he is on social security disability collecting a check for mental health reasons. He gets paid under the table has been for ten years. He has a total of six to eight workers at all times two make about (\$200) two hundred to two hundred and fifty dollars \$250.00 a day. The rest of the employees make about a hundred to a hundred and fifty dollars a day. This has been going on under the table for for about fourteen years. So the other four make \$150 a day. Kevin also told me he does not like to report anything cash he says he reports some cash jobs but not all because uncle Sam wants \$.25 twenty five cents for every dollar he makes. So cash tips he does not report either he says anyone gives use cash you keep it because you earned it I am not going to report it because it is cash. I started a Whistle Blower case in June 2022 or July 2022 is when they recorded it. He has been or K&J Fence Inc has been under a IRS audit since July 2022. Since July 2022 he has been going thru numerous judges Nancy Ridgeway who has complete immunity and Renee Marie Bumb. These judges have been providing aid in Kevin's / K&J Fence Inc.

(Continued on another page)

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Anthony David Mitros 865432E/1330996 Northern State Prison E/1/West
 When I was in court for a final restraining order in April 2024
 Kevin went with my mother Linda Marie Mitros to Atlantic City
 Superior Court Civil Family Division. On that day Nancy Rodgeway
 questioned me about my Whistle Blower case and got all information
 to Ogden Utah and Whistle Blower Office in Washington D.C..
 She called everything invalid like I was harassing them. So I started
 a couple new cases in U.S. District Court Camden N.J. 08101.
 I tried starting a harassment case against his daughter. That
 case got dismissed in four weeks not for frivolous or malicious but
 because the account certification form was not signed by anyone else
 but me. When I did the same thing in Newark U.S. District Court and
 they accepted it. Also I filed a case with three defendants against
 K&J Fence Inc that got dismissed after six weeks for too many defen-
 ants living in the same state apparently you can't have more than one
 defendant who lives in the same state.

So there is a track record of me filing a lawsuit against his business
 and family in the past years since 2022 most getting dismissed not even
 investigated. Remember he keeps (\$10,000.00) ten thousand dollars on him at
 all times and has Constables/Sheriff's from Atlantic County Kenneth Mulock
 monitoring his business so he rolls with Eric Shettler/Steven Shettler
 Sheriff's and lawyers from Atlantic County. But anywho he commits
 fraud by failing to pay wages on the books to all eight or seven of his
 workers. Failing to report all jobs especially or only cash jobs he fails to
 report. Hiring of illegal immigrants. Also hiring someone on social security
 disability paying them under the table so. Then not reporting anything to
 Social Security disability. He also does not have decals, business insurance
 he is not fully insured, has vehicles in employees names, the whole business K&J
 Fence Inc is in wife Jennifer McConnell's name, all vehicles are not registered
 and insured commercially. They think that I am trying to ha ha ha or
 he he he them what ever that is supposed to mean. They think they are
 fooling people and the sad part is they are not fooling anyone. Countless times
 I worked for K&J Fence Inc on the weekends voluntarily and I would do
 the work he would say I am not paying you you drank last night you did
 all this work hung over. He would get me to work then say my drinking
 was the excuse why I did not pay you today. He is a swindler and a hater.

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Anthony David Michals 865432E/1330996 Northern State Prison E/1/West

According to state law if you pay anyone under the table over \$600.00 dollars you are committing fraud. You can only pay someone \$600.00 dollars in cash then the rest has to be recorded and put on the books or you are in violation of the law. All the things I stated with registration, taggings, insurance, hiring illegals, paying under the table, hiring people on disability. These are mandatory things that people have to do to run a business properly. They do not have a leg to stand on. They make fast money and people believe Kevin because of how much money he has. He does not do any of the work his guys do.

If Kevin's wife is getting a divorce soon that is also another thing Kevin's wife works for (GCIT) Gloucester County Institute of Technology so she is on payroll for K&J Fence Inc., also as a teacher for (GCIT). So they are supposed to be in another tax bracket. Here is an example if the business pulls in (\$300,000.00) three hundred thousand dollars a year. About (\$100,000.00) one hundred thousand is cash they only report that they made (\$200,000.00) two hundred thousand dollars. Plus whatever Jennifer makes at GCIT. They were getting a divorce so go ahead that whistle blower case and make the IRS feel bad the divorce was for propaganda with IRS. Once I started cases in U.S. District Court you could see they forgot about their differences and all worked together.

No matter what they won't admit when they are wrong they would rather blame me. If Kevin was a bum would it still be acceptable to walk around every prison I am at to harass me probably not. This kid is why not put forth the effort to change things rather than harass the spit out of me. They are supposed to be in another tax bracket. What it would be like because everything was in Jennifer McConnell's name bank accounts, houses, vehicles, all assets, and whole business to save mucho dinero or a lot of money. I would like it if I could have six years of employee wages, tax records, and employee work history the law only asks for six years mandatory. Also I would like to see copies of the bank account Kevin was running the business with a restraining order between January of 2023 till date joint accounts require two signatures. Also any other employment documentation to prove he is running the business like he is supposed to a honest man will have no problem or won't need a lawyer. He keeps all filing cabinets in a loft in his warehouse at business address.

5. I previously have sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in the Statement of Claims on page 6.

☒ Yes ☐ No

If your answer is "Yes," briefly describe the steps taken, including how relief was sought, from whom you sought relief, and the results.

started case in U.S. District Court.

If your answer is "No," briefly explain why administrative remedies were not exhausted.

NA

6. Statement of Claims

(State here as briefly as possible the facts of your case. Describe how each defendant violated your rights, giving dates and places. If you do not specify how each defendant violated your rights and the date(s) and place of the violations, your complaint may be dismissed. Include also the names of other persons who are involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach a separate sheet if necessary.)

I have known of this man for over twenty years.
I have lived across from his business address
from 2012 to 2020. My parents owned the
house from or across from his business from
2001 to 2020. He started out running his
business that was passed down to him right.
When his father and brother were running and

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 2 pieces of paper 4 pages

Managing the business the business was top notch. Four or for I should say the past fourteen years Kevin's father and brother have passed away R.I.P. The business has sadly declined so Kevin did not start this business himself from scratch his parents or father did and passed it down to him. Or he bought it off them and let him work or them work for him rather after he got a loan from the bank years ago. Kevin did not start the business from scratch but he does not file his taxes properly for share.

- All workers are being paid under the table.
 - Some workers (Alfredo) are illegal immigrants
 - Some workers live in NJ and have pa license plates
 - Some workers are on social security disability
 - John purchasey getting paid under the table and not reported
 - The business is not fully insured to my knowledge he would rather save money and pay out of pocket
 - Most of the time work is done without permits most of the time construction permits are not obtained
 - Work vehicles are not all registered and insured in owners name or commercially some are in employees names (Michael Purchasey)
 - He fails to properly file his taxes for business by not claiming tax jobs or customers that pay with cash or give cash tips. Uncle Sam takes twenty five cents on every dollar he makes. All workers except one or two get paid under table he has eight to ten workers sometimes his workers get paid cash not check no money
7. Relief is taken out for taxes he does not require employees to fill out tax forms.

(State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

To have Kevin or Jennifer McConnell at L&J Fence Inc. Provide (6) Six years of employee tax and work history information as honest owners should to also provide bank account information business was being ran

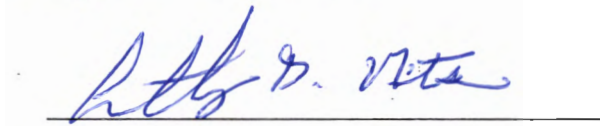
With a restraining order some joint accounts need two signatures. Also to provide the courts with any or all employee wage information. Please take the time to analyze this case like a Freudian like you have fourteen years of psycho analysis under your belt. Not like your friends with the opposing party and your cutting them entirely to match slack and they don't have to change how they run the business. You need to analyze and change how they run and manage there business completely.

8. Do you request a jury or non-jury trial? (Check only one)

☒ Jury Trial () Non-Jury Trial

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 30th day of May, 2025



Signature of plaintiff*

(*EACH PLAINTIFF NAMED IN THE COMPLAINT MUST SIGN THE COMPLAINT HERE. ADD ADDITIONAL LINES IF THERE IS MORE THAN ONE PLAINTIFF. REMEMBER, EACH PLAINTIFF MUST SIGN THE COMPLAINT).